

# Exhibit C

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Thomas I. Vanaskie (Ret.),  
Magistrate Judge

**DECLARATION OF DR. MIN LI**

1. I am Vice President of Analytic Operations for Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), with responsibility for overseeing company-wide analytical research and development, and providing technical leadership in the company’s API quality control operations. I submit this declaration in support of the motion to seal certain confidential documents filed by Defendants ZHP, Princeton Pharmaceutical Inc. (“Princeton”) and Huahai U.S. Inc. (“Huahai U.S.”).

2. I submit this declaration in support of maintaining as confidential certain documents produced by Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Huahai U.S. Inc. (“Huahai U.S.”) and Solco Healthcare U.S., LLC (“Solco”, and collectively with ZHP, Huahai U.S., and Princeton, “the ZHP Parties”).

3. I state that I have reviewed the below document Plaintiffs intended to file as Exhibit X to ECF No. 1189, and that this declaration is made on the basis of my personal knowledge.

4. **CHARLESWANG000026 (ECF No. 1189, Ex. X)** (designated “RESTRICTED CONFIDENTIAL INFORMATION”): This document consists of emails from October 2018 between the ZHP Parties’ consulting toxicologist, Dr. Charles Wang, and myself, in which I sought Dr. Wang’s feedback regarding a proposed research plan and testing methods for a suspected genotoxic impurity. The emails contain highly sensitive, non-public information regarding the ZHP Parties’ proprietary testing methods and results, which, if disclosed, would allow ZHP’s direct competitors to benefit from ZHP’s research and development plans and testing methodology, thereby awarding them a significant competitive advantage.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT TO THE BEST OF MY KNOWLEDGE THE FOREGOING IS TRUE AND CORRECT.

Executed on January 14, 2022 in Shanghai (city), China (state).



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, Declarant